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April 23, 2025

Via ECF

The Hon. James R. Cho, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lin et al v. Fuji Hana Restaurant Corp et al*
Case No.: 1:21-cv-03832-NCM-JRC

Dear Honorable Magistrate Judge Cho,

This law firm is counsel to Defendants Fuji Hana Restaurant Corp. (d/b/a Fuji Hana Kosher Japanese Restaurant) (d/b/a Fuji Hana), Lorraine Gindi, Estate of Isadore Gindi, by executor Raymond Betesh, Isadore Natkin, and Jack Cohen (collectively, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives contained in Your Honor’s April 3, 2025 Order, the instant letter respectfully serves to provide the Court with an update, regarding the status of discovery in the above-referenced action.¹

On April 2, 2025, the undersigned provided Plaintiffs’ counsel with a class list, identifying: (i) the number of employees in the proposed class; (ii) the first and last names of these employees; and (iii) the time period they had worked for Defendants. The class list was accompanied by a sample disclosure of time and payroll records for two (2) of the employees, identified on the class list.

Despite the undersigned’s efforts, Plaintiffs’ counsel is still not satisfied with Defendants’ sample production. In light of the foregoing, it is respectfully requested that the Court schedule a telephonic conference, to address the propriety of any further class-wide discovery. If granted, this request would also necessitate an extension of the fact discovery completion deadline to, through and including June 23, 2025.

Thank you, in advance, for your time and attention to this matter.

¹ The undersigned emailed counsel for Plaintiff Desheng Lin (a/k/a Jimmy Lin) and opt-in Plaintiffs Yunyan Gao (a/k/a Sandy Gao), Siu Na Chan (a/k/a Daisy Chan), Mingxing Jiang, and Darren Klemons (collectively, the “Plaintiffs”) prior to the filing of the instant letter. However, Plaintiffs’ counsel has not responded to the undersigned’s meet-and-conferral request. This, the instant letter does not include Plaintiffs’ position statement.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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